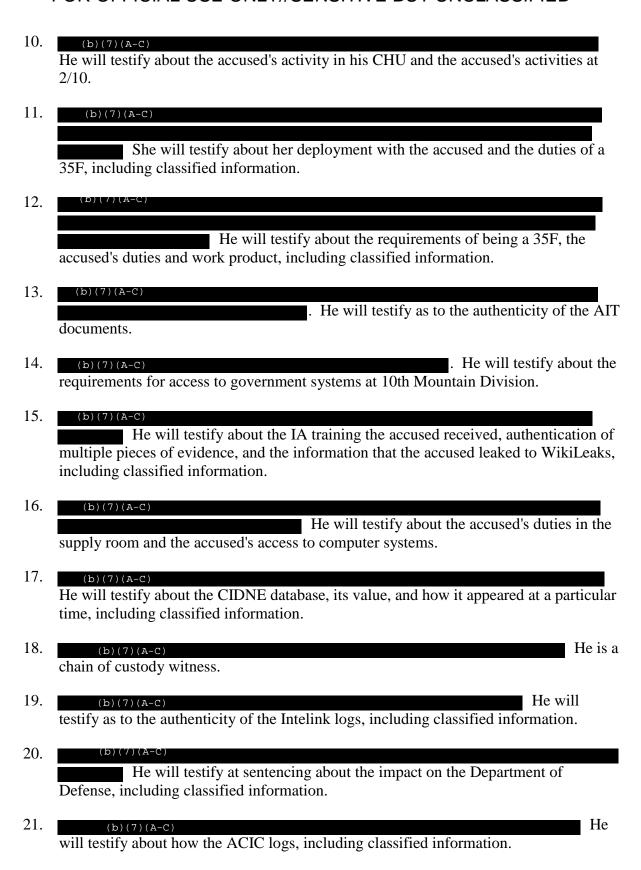
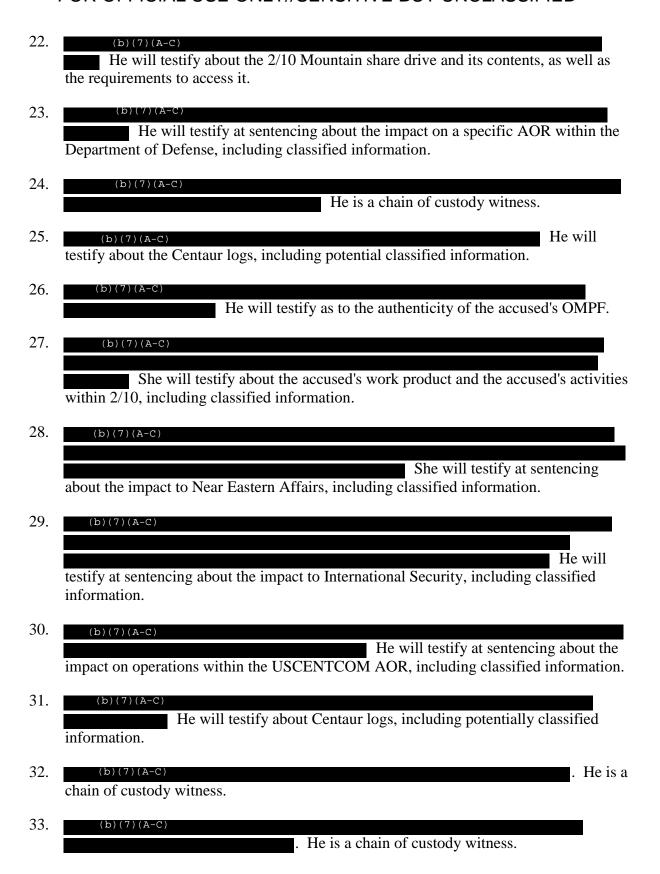
UNITED STATES OF AMERICA)
v.) Updated Prosecution Witness List
Manning, Bradley E. PFC, U.S. Army, HHC, U.S. Army Garrison, Joint Base Myer-Henderson Hall Fort Myer, Virginia 22211))) 15 October 2012)
The prosecution may call the below witner the presentencing phase of the above-captioned brief description of the general substance of with prosecution currently intends to elicit classified in	ness testimony, including whether the
1. (b) (7) (A-C) He will testify about 6 information.	enemies of the United States, including classified
2. (b) (7) (A-C) He will testify about the accused	d's training, activities, and duties.
3. (b) (7) (A-c) She will testify concerning the accused	's execution of an SCI NDA.
4. (b) (7) (A-C) She will testify as to the	ne authenticity of the OPM records.
5. (b)(7)(A-C) . He will to	restify as to the authenticity of the OSC logs.
6. (b) (7) (A-c) She will testify as to the authenticity of	f the JAMMS records.
7. (b) (7) (A-C) of the supply room computer.	. She will testify concerning her use
8. (b) (7) (A-c) testify about the accused's intelligence a 2/10, including potential classified info	He will systems training and the accused's activities at ormation.
9. (b) (7) (A-C) testify as to the authenticity of the ACI	He will C logs, including classified information.

¹ As of the date of this filing, persons identified with an asterisk ("*") are witnesses only for purposes of the presentencing phase.





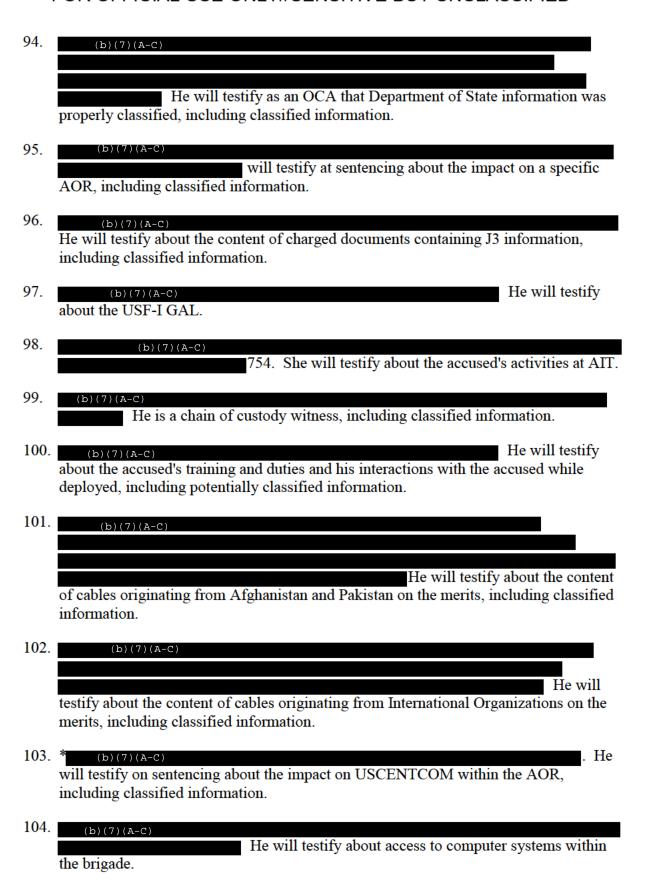
34.	(b) (7) (A-C) He is a chain of custody witness.
35.	(b)(7)(A-C)
	. He will testify about the content of cables originating from and sent to the Western Hemisphere on the merits and the impact to Western Hemisphere Affairs on sentencing, including classified information.
36.	(b) (7) (A-C) He will testify as to the authenticity of the accused's IA training.
37.	(b) (7) (A-C) the accused's activities while deployed. He will testify about
38.	(b) (7) (A-C) will testify about the the accused's training, duties, and work product, including classified information.
39.	(b) (7) (A-C) He is a chain of custody witness.
40.	(b) (7) (A-C) She will testify about a Department of the Army classified charged document, including classified information
41.	(b) (7) (A-C) He is a chain of custody witness.
42.	She will testify about the law enforcement investigation in Iraq.
43.	testify about the USCENTCOM server logs, including potentially classified information.
44.	(b)(7)(A-C)
	He will testify at sentencing about impact to South and Central Asian Affairs, including classified information.
45.	(b) (7) (A-c) He will testify about the accused's work product, including classified information.
46.	He will testify about information security.

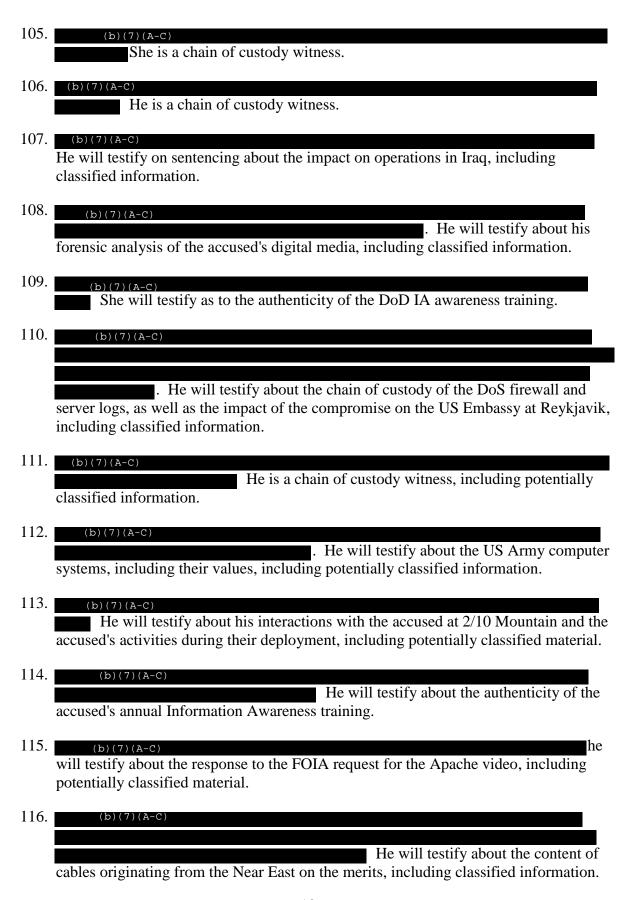
47.	He will testify as an original classification authority (OCA) that charged information was properly classified, including classified information.
48.	(b) (7) (A-C) . He will testify about the CIDNE database, including potentially classified information.
49.	(b) (7) (A-C) He will testify about the CIDNE database, including potentially classified information.
50.	He will testify about the CIDNE database, including potentially classified information.
51.	She will testify about her forensic analysis of digital media, not belonging to the accused, including classified information.
52.	(b) (7) (A-C) He will testify about the C3 document.
53.	He will testify about the content of charged documents containing J5 information, including classified information.
54.	She will testify about the authenticity of the accused's SCI Indoctrination packet
55.	He will testify about OPSEC.
56.	. She is a chain of custody witness.
57.	(b) (7) (A-c) She will testify concerning requirements of being a 35F.
58.	(b) (7) (A-C) He will testify
59.	about the authenticity and chain of custody of the DoS server logs.

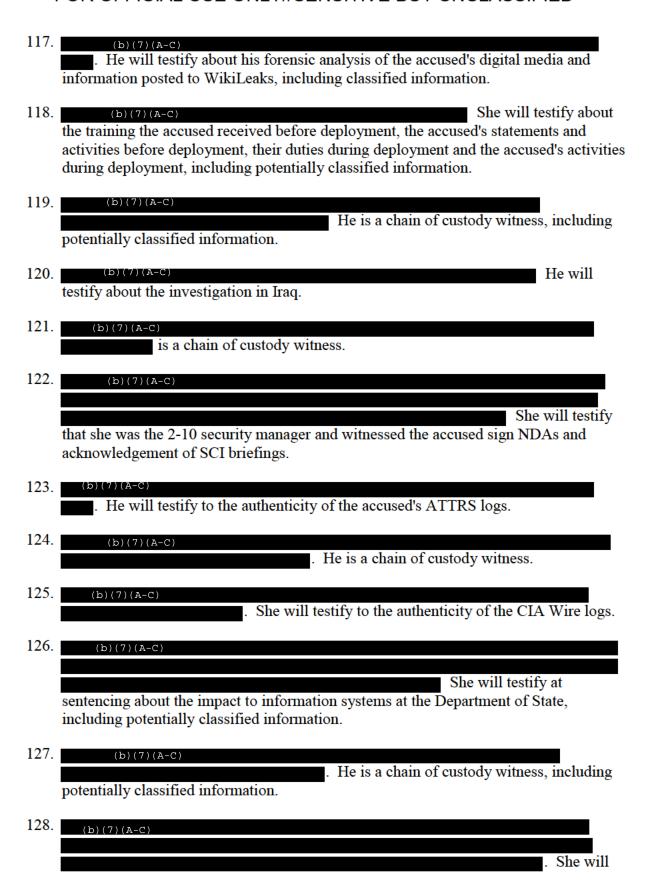
	He will testify about NCD, including potentially classified information.
60.	(b) (7) (A-C) He will testify about his forensic analysis of the accused's digital media, including classified information.
61.	. He will testify on sentencing about the impact to the
62.	Department of State, including classified information. (b)(7)(A-C) He is a chain of custody witness.
63.	(b)(7)(A-C)
64.	. He will testify in sentencing about the impact to the Department of Defense, including classified information.
	He will testify on sentencing about the impact on individuals classified as persons at risk by the Department of State, including classified information. This testimony will <u>not</u> include PII of any specific individual.
65.	his digital chat with the accused. The United States does <u>not</u> intend to elicit any classified information contained within the digital chat log.
66.	(b) (7) (A-C) He will testify about the content of the Apache Video.
67.	He will testify about counterintelligence and the value of information, including classified information.
68.	He will testify about the 2/10 Mountain share drive and its contents, the accused's training and duties, including potentially classified information.
69.	. She will testify about the investigation in Iraq.

70.	(b)(7)(A-C)
	He is a chain of custody witness.
71.	* (b) (7) (A-C) He will testify at sentencing about a specific category of impact on the United States Government and the Department of Defense, including classified information.
72.	(b)(7)(A-C)
	. He will testify about the 35F training, 2/10 predeployment training, and the use of his SIPRNET computers while deployed, including potentially classified information.
73.	(b) (7) (A-C) . He will testify about the accused's training at AIT
7.4	will testify about the accused's training at AIT.
74.	She is a chain of custody witness.
75.	(b)(7)(A-C)
	He will testify about Wikileaks operations, the investigation of the accused, and certain enemies of the United States being in possession of information, including classified information.
76.	(b) (7) (A-C) will testify about the accused's training at AIT.
77.	(b) (7) (A-C) He will testify about how Intelink logs, including potentially classified information.
78.	He will testify at sentencing about the impact on USCENTCOM, including classified information.
79.	(b)(7)(A-C)
	will testify on sentencing about impact concerning IEDs, including classified information.
80.	(b) (7) (A-C) . He will testify about the DCGS-A system, including potentially classified information.
81.	(b) (7) (A-C) testify about the training received at AIT.

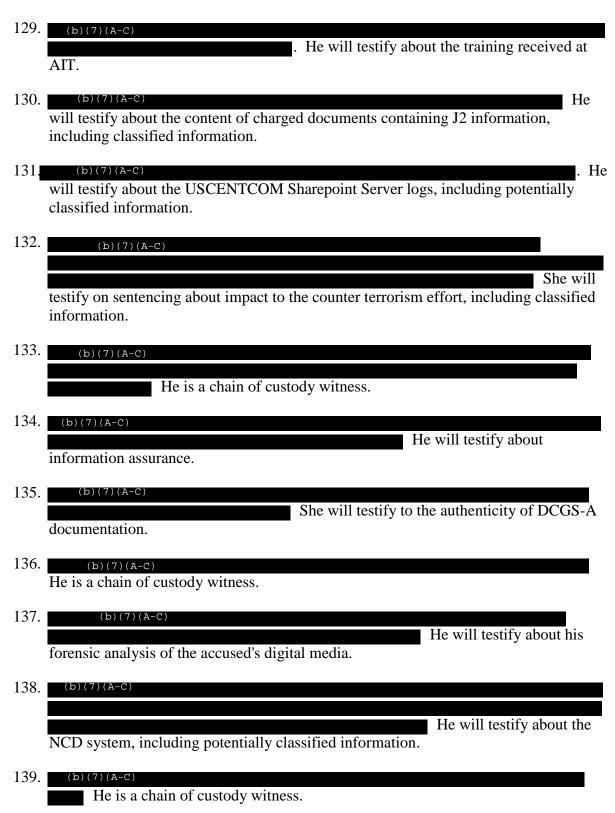
82.	* (b)(7)(A-C) . He will testify at sentencing about the impact on strategic
	planning within the USCENTCOM AOR, including classified information.
83.	He is a chain of custody witness.
84.	(b) (7) (A-C) She is a chain of custody witness.
85.	(b) (7) (A-C) Will testify about the accused's misconduct and multiple investigations. He
86.	He will testify about the accused's access to DCGS-A, including potentially classified information.
87.	(b)(7)(A-C)
	He will testify about the content of cables originating from South and Central Asia on the merits, including classified information.
88.	(b) (7) (A-C) He will testify about the information posted to the USCENTCOM OSJA SIPRNET website, including potentially classified information.
89.	(b) (7) (A-C) . He will testify about the JTF-GTMO database and the contents of compromised information, including classified information.
90.	. He will testify about instructing the accused at AIT.
91.	(b)(7)(A-C)
	He will testify on sentencing about the impact on East Asian and Pacific Affairs, including classified information.
92.	(b) (7) (A-c) . He will testify about the authenticity of the Centaur logs.
93.	(b) (7) (A-C) He will testify about the
	authenticity and chain of custody of the DoS firewall logs, including potentially classified information.

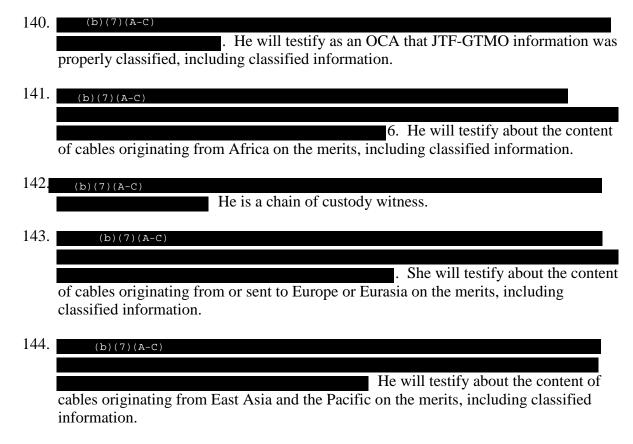






testify to the authenticity of Department of State documentation, including potentially classified information.





Several of these witnesses may become unnecessary depending on the outcome of subsequent Court rulings. The prosecution may add witnesses to this list, depending on the outcome of subsequent Court rulings, to include those relating to Military Rule of Evidence (MRE) 505 and any witnesses relating thereto. The prosecution may replace witnesses on this list, should it become necessary due to a Permanent Change of Station, job relocation, change in job position, or change in level of security clearance of a listed witness.

The prosecution acknowledges an ongoing obligation to provide the defense prompt notice of any other potential witnesses that come to its attention and will adhere to the local rules. The prosecution will communicate its final witness list according to Rule 2.1.8 of the Rules of Practice before Army Courts-Martial (2012) and the Court's order.

If the defense intends to produce a witness who is listed above, the defense must provide a separate, appropriate request for that witness in accordance with Rule for Courts-Martial (RCM) 703 and the standard articulated in <u>United States v. Rockwood</u>, 52 M.J. 98, 105 (1999) that a witness request include a "synopsis of expected testimony," not merely a list of topics to be covered. If necessary for a particular witness employed by the United States Government, the defense shall also comply with 5 U.S.C. § 301 and Touhy v. Ragen, 340 U.S. 462 (1951).

ASHDEN FEIN MAJ, JA Trial Counsel

Enclosure Classified Supplement to Witness List

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel via electronic mail, on 15 October 2012.

ASHDEN FEIN MAJ, JA Trial Counsel